



One Grand Central Place | 60 East 42nd Street | 51st Floor  
New York, New York 10165  
Tel 212-453-5900 | Fax 212-453-5959

Writer's Direct Contact:  
JENNIFER A. WILLIAMS  
212-453-5949  
JWilliams@fordharrison.com

September 8, 2016

Magistrate Judge Steven I. Locke  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Shenithia Cowell, *individually and on behalf of all similarly situated individuals*,  
v. Utopia Home Care, Inc. – 14-CV-736 (LDW) (SIL)

Dear Judge Locke:

We represent Defendant Utopia Home Care, Inc. in the above-referenced matter. I write to respectfully request an adjournment of certain dates set forth in your Memorandum and Order dated August 8, 2016. See Docket Entry #57 at 17.

The reason for the request is I have recently joined FordHarrison LLP and need to familiarize myself with this case. The associate who previously handled the matter left the firm in July.

In addition, FordHarrison moved offices in late August, which has caused some disruption to the firm's case management. Due to this move, we only received Plaintiff's discovery requests on September 6, 2016.

Therefore, Defendant, with the consent of Plaintiff, requests that the discovery schedule be modified as follows:

Defendant's Rule 26(a) disclosures: **September 13, 2016**  
Defendant's Discovery Requests: **September 13, 2016**  
Defendant's Response to Plaintiff's Discovery Request: **October 7, 2016**  
Plaintiff's Response to Plaintiff's Discovery: **October 14, 2016**

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Williams', followed by a long horizontal line.

JENNIFER A. WILLIAMS

JAW